

**Comment Letter 5. Susan and John Van Der Wal, Inverness, CA.**

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Mr. Don L. Neubacher  
Superintendent  
Pt. Reyes National Seashore  
Pt. Reyes Station, CA 94956

Attn: FIRE MANAGEMENT PLAN

Dear Superintendent Neubacher:

We have reviewed the DEIS for PRNS and the northern lands of GGNRA and have the following comments and concerns.

**Comment**  
**5-1**

Pollution: Health reasons - the breathing of smoke hiking, our homes - outside during chores, enjoying our deck, windows open for the clear fresh air and airing house out on a daily basis. Constant days, weeks, months and years of this is very undesirable to say the least. It affects our communities as we all run errands. Noise from equipment on ground and planes and helicopters. We already have a major problem with the planes flying over the areas and all the parks. All this infringes on the solitude we all seek and one of many reasons most of us moved out here in the first place.

**Comments**

**5-2**

**5-3**

**5-4**

Aesthetics: The constant burning and even intermittently does not solve the problems. Unsightly views of burned environment throughout the parks and roadway views; destroying non-native trees will eliminate shade for humans, wildlife and the habitat, nesting, etc. Wildlife needs bushes and use them for safety, shade, hunting, nesting (deer, elk, bobcats, etc. leave young among these bushes which you will be destroying.) The burned environment only gets green after a lot of rain which is winter time. We are very concerned about the effect of such a plan to the wildlife. We want to hear, see the many varied birds in the grasslands, trees, bushes not less no matter non-native, we love the whole feel and experience of our many hikes to Wittenberg and loops, Estero, Greenpicker to Pirtop, etc. We are not keen on "experimental-pilot burns" either. While protecting private property has its merits, we see the forest, removing under-brush has become excessive taking away individual privacy. Using the private property as an excuse for other motives. There is a lot of hyperbole and the attempt to force fear into the public - works the opposite with us.

We chose to live here for the woods with the variety of trees and natural untouched beauty and the parks bordering our village of Inverness. We have been here for 22 years and are well aware there are risks living in such environment. But life is full of risk. We had one fire and the

(over)

**Comment 5-1.** Fire management actions will generate smoke, a health hazard, and increase noise from ground equipment and aircraft used in fire response.

**Response to Comment 5-1.** Prescribed burning does generate smoke but under conditions meeting the criteria of the Bay Area Air Quality Management District. Smoke generation is a short-term impact, lasting the duration of active prescribed fire and is localized in effects. Smoke generation would have greatest effects when prescribed burning is conducted in close proximity to residential areas. The primary residential areas adjacent to park lands are the Bolinas mesa and Paradise Ranch Estates. The BAAQMD requires a Smoke Management Plan for all prescribed fire as a means to assess potential affects of the fire on air basin air quality and potential health effects of smoke on adjacent residents. In conformance with BAAQMD requirements, the SMP includes the following project information:

- location and specific objectives of each proposed bum;
- acreage, tonnage, type, and arrangement of vegetation to be burned;
- directions and distances to nearby sensitive receptor areas;
- fuel condition, combustion and meteorological prescription elements for the project;
- projected bum schedule and expected duration of project ignition, combustion, and bum down
- (hours or days);
- specifications for monitoring and of verifying critical parameters including meteorological
- conditions and smoke behavior before and during the bum;
- specifications for disseminating project information to public;
- contingency actions that will be taken during the burn to reduce exposure if smoke intrusions impact any sensitive receptor area;
- certification by a qualified professional resource ecologist, biologist, or forester that the proposed burning is necessary to achieve the specific management objective(s) of the plan;
- a copy of the environmental impact analysis prepared for the plan that includes an evaluation of alternatives to burning, if such an analysis was required by state or federal law or statute;
- project fuel loading estimate (tons vegetation/acre) by vegetation type(s) and a description of the calculation method; and
- particulate matter emissions estimate including referenced emission factor(s) and a description of the calculation method used. (BAAQMD, Regulation 5, Open Burning, Section 408).

The Draft EIS addressed the impacts of smoke on air quality and on human health on pages 232, and 395-396 (Alternative A), pages 236 and 398 (Alternative B) and pages 240 and 400 (Alternative C). Impacts from increased noise generated by heavy equipment and chainsaws, particularly during suppression actions is addressed on page 380-384 (Alternative A), 385-386 (Alternative B) and 387-389 (Alternative C). The FMP does not propose use of aircraft. Noise generation from aircraft would occur as part of wildfire suppression actions that could occur with

or without the FMP and is not an effect of the FMP.

**Comment 5-2.** Prescribed burning will leave areas looking unsightly until the rains.

**Response to Comment 5-2.** The assessment is accurate. Given the potential for a large-scale wildfire to drastically alter the park setting, prescribed burning resulting in scattered areas of blackened acreage that revegetates quickly would be preferable to the effects of hotter, more damaging wildfire that would burn indiscriminately altering sensitive viewsheds. Areas subject to prescribed fire would appear blackened until regrowth occurs with winter rains. These short-term, moderate, adverse impacts are described for the three alternatives on pages 380-381 (Alternative A), page 385 (Alternative B) and page 387 (Alternative C).

**Comment 5-3.** Removing non-native vegetation will eliminate shade for humans and animals alike, remove screening understory vegetation and valuable habitat provided by the understory.

**Response to Comment 5-3.** As discussed in the Draft EIS, mechanical removal and prescribed burning of understory vegetation would have both adverse and beneficial short-term impacts on wildlife. Certain species, such as woodrats, may be attracted to temporarily stockpiled vegetation debris and displaced later during pile burning. Other wildlife species, such as deer, could benefit from improved foraging in clearings. In addition, the project actions themselves, involving vehicles and chainsaws among other equipment, would generate noise and locally disturb wildlife in the vicinity of projects over the short-term. Discussion of impacts of fire management actions on wildlife is addressed on pages 302 to 316. Impacts to special status wildlife species, in addition to special status plant species, are discussed on pages 323 through 368.

**Comment 5-4.** Commenters are not in favor of experimental pilot burns; reducing understory brush takes away individual privacy. The potential fire hazard has been exaggerated.

**Response to Comment 5-4.** As described on Draft EIS pages 87-89, recurring wildfires are part of the ecology of the Point Reyes peninsula. It's true that the degree of fire hazard varies throughout the year, but the Vision Fire and other conflagrations in the Bay Area have shown that extreme fire hazard conditions can develop in late summer and early fall.

parks, agencies involved go ballistic!

Comment  
5-5

We are concerned about the exact location of those "staging areas" and "fire barriers" which involve construction/destruction and the visibility factor.

Comment  
5-6

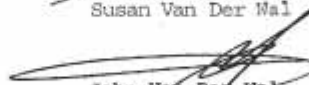
The report refers to "visitors experience" but what about the locals who live and work here and the communities experience? You can't imagine how visitors reactions to burning and other noises relating to Fire Management Plan have on their visits. Many people do get out of their cars, hike, picnic, etc. We certainly would not encourage anyone to come out here with the burning and other activities pertaining to the plan. We experienced first hand a control burn gone out of control at Banff National Park, Canada during the height of the summer (best weather) and tourist season. It was terrible and in such a gorgeous area - smoke and noises constant - so much for seeing the Canadian Rockies in clear blue sky. A real stupid plan by Canadian officials. Your plan calls for burning/mechanical treatment on weekdays (for the locals) and no workweekends/holidays (for the visitors and Bay Area visitors). Many tourist come out weekdays simple because they are traveling from out of state/country and many visitors come weekdays to avoid the crowded weekends. The public doesn't really know how massive Alternative B/C are and many people do not want to express any thoughts on the Plan publicly for fear they would be looked upon as anti-fire management. We aren't either but, find the B/C and particularly C is too massive and very aggressive which is what you want. We prefer Alternative A - no more action.

Reviewing the DFMP/EIS was most educational and very thorough, time consuming and costly. It's our second such review report this year - the other was Tomales Bay State Park.

Thank you for the opportunity to comment on the Plan.

Sincerely,

  
Susan Van Der Wal

  
John Van Der Wal

sk/

We may be contacted by e-mail (front page of this letter). The local post offices are best for fire burn days. <sup>post offices</sup> do not go daily to the Bovine Bakery which is open daily.

**Comment 5-5.** Commenters are concerned about the exact location of areas where disturbance would occur such as staging areas and fire lines around prescription burns.

**Response to Comment 5-5.** The FMP has a broad focus and does not identify the location of specific projects but rather ways to mitigate the effects of specific future projects by reducing the level of affect on soils, vegetation and watershed by careful siting. For example, on Draft EIS page 58, under Mitigation Measure W-3, helispots, staging areas, and spike camps would be located at least 100 feet away from streams, creeks, and other water bodies. Measure V-1 requires that existing roads or trails be used as firebreaks for prescribed burns and for wildland fire suppression whenever possible in order to reduce disturbance, vegetation removal and aesthetics effects. Additional measures to rehabilitate lands disturbed by project actions are found on pages 55 through 59. All specific projects would be assessed for conformance with the guidelines and mitigation measures described in the Draft EIS.

**Comment 5-6.** The FMP DEIS should consider the affects of fire management actions on nearby residential communities as well as the visitor experience.

**Response to Comment 5-6.** Both the Draft and Final FMP addresses the effects of fire management actions on residential neighborhoods as part of the air quality assessment (localized smoke effects), impacts to visitor use and visitor experience (noise and visual effects) and public health and safety (smoke inhalation).

**Comment 5-7.** The Commenters prefer Alternative A; annual acreage amounts under Alternatives B and C are too large.

**Response to Comment 5-7.** Comment and preference noted.